

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WILANIS COTTO TORRES

DEBTOR

CASE NO. 19-05921/ESL

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION FOR COPY OF TAX RETURN,  
DOCKET NO. 39**

**TO THE HONORABLE COURT:**

**NOW COMES, WILANIS COTTO TORRES**, the Debtor, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion for Copy of Tax Return*, Docket No. 39, requesting the Court to Order the Debtor to provide copy of the Debtor's 2021 tax return.

2. The Debtor hereby respectfully informs this Honorable Court that on August 11, 2022, the Debtor sent to the Trustee (uploaded to the Trustee's system) a copy of the Debtor's 2021, tax return.

3. Based on the above stated, the Debtor respectfully requests that this Honorable Court be informed of the foregoing and grant the present motion in reply to the *Trustee's Motion for Copy of Tax Return*, Docket No. 39, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion in reply to the *Trustee's Motion for Copy of Tax Return*, Docket No. 39, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to the CM/ECF participants, including the Chapter 13 Trustee; I also certify that a copy of this

motion was sent via US Mail to Debtor, Wilanis Cotto Torres, to the address of record: Urb  
Los Pinos Buzon 16, Cidra PR 00739.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 11<sup>th</sup> day of August,  
2022.

/s/ **Roberto Figueroa Carrasquillo**  
USDC 203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
ATTORNEY FOR PETITIONER  
PO BOX 186  
CAGUAS PR 00726-0186  
TEL 787-744-7699/787-963-7699  
EMAIL: [rfc@rfigueroalaw.com](mailto:rfc@rfigueroalaw.com)